

**RUSSELL LAW GROUP, PLLC**

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**Via Electronic Case Filing**  
**& Regular Mail**

July 18, 2016

The Honorable Kiyo A. Matsumoto  
United States District Court Judge  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: United States of America v. Imran Ishmile Badoolah**  
Indictment No.: 12-CR-774(KAM)

Dear Judge Matsumoto:

This firm represents Imran Badoolah, and we respectfully submit this letter for the Court's consideration in sentencing him in the above referenced matter on August 30, 2016. The purpose of this letter is to inform the Court what we believe to be an appropriate Guidelines Range, and to provide significant facts relevant to sentencing which we believe warrant a substantial downward departure and outside of the Guidelines Sentence for Mr. Badoolah. We are respectfully seeking a sentence of time served as Mr. Badoolah has been confined to his home for almost four years and presents with a number of mitigating factors.

## **A. MR. BADOOLAH'S BACKGROUND**

The Court's determination of an appropriate sentence should be guided by consideration of the factors set forth in 18 U.S.C. 3553(a), which are discussed below in relevant part.

### **1. The History and Character of the Defendant.**

Mr. Badoolah is forty-six (46) years old and was born in Berbice, Guyana, where he grew up in a close knit poor working class family, compromising of his father, Ishmile, Rihannah (mother) and brother, Zaman. Imran attended school while he worked with his father in rice fields cultivating rice. He attended Bushlott High School where he completed two or three years of school but had to drop out as he was unable to maintain the rigorous demands of working to support his family and attending high school. Although the family was very poor their faith in the Muslim religion gave Imran and his family the strength and courage they needed to persevere. In that vein Imran, his brother and five others from his village enrolled in the Islamic Institute located which was then located in the village of Leonora, Guyana. After just four or five months at that institution word came from Imran's father that the family would be migrating to the United States which occurred on December 27, 1989.

Upon arriving in the United States at the age of 18 or 19 years old, Imran and his family lived with his uncle, Hanil, in Brooklyn for approximately three months then moved to Queens. Consistent with Imran's work ethic he, along with his brother and father secured employment within two weeks of entering the country at a Duane Reade working as stock clerks. Imran worked there for two or three years then transitioned to a company called Comco Plastics where he worked as a laborer on a production line manufacturing plastic parts. While working at Comco Plastic, Imran's father and

brother purchased a house located at 87-63 125 Street in Richmond Hill 11418 with the assistance of his mother-in-law Bibi Shaw as the cosignor.

His brother, Zaman, informed Imran that his employer was hiring and Imran then obtained employment with Accordia Insurance as a mail and filing clerk located at 90 Park Avenue in New York City. Imran work in that capacity for approximately five/six years. Unfortunately, Imran fell ill and was unable to report to work for about a week. When he returned to work he was advised that he was terminated.

Disappointed with the news of his termination and facing three young children and an ex-wife to support at that time, Imran and his father decided to use the equity from the family home to invest in real estate as Imran's source of income and employment to support his family. It is this transaction that launched Mr. Badoolah in the world of real estate investment.

Since then Mr. Badoolah has expanded his business ventures to include donut and juice franchises in Saudi Arabia. Mr. Badoolah has eight children who relied on him for financial support prior to his arrest. Quite naturally, since his arrest he is financially ruined. He suffers from high cholesterol and needed treatment for the sores that festered on his ankle as a result of his ankle bracelet that he wore for over three years.

## **B. APPLICABLE STATUTORY PROVISIONS**

§2B1.1. Larceny, Embezzlement, and Other Forms of Theft; Offenses Involving Stolen Property; Property Damage or Destruction; Fraud and Deceit; Forgery; Offenses Involving Altered or Counterfeit Instruments Other than Counterfeit Bearer Obligations of the United States

(a) Base Offense Level: 7, if (A) the defendant was convicted of an offense referenced to this guideline; and (B) that offense of conviction has a statutory maximum term of imprisonment of 20 years or more; or

(2) 6, otherwise.

### **(b) Specific Offense Characteristics**

(1) If the loss exceeded \$6,500, increase the offense level as follows:

	Loss (Apply the Greatest)	Increase in Level
(F)	More than \$150,000	add 10
(G)	More than \$250,000	add 12 (not applicable)

**E) Credits Against Loss.— Loss shall be reduced by the following:**

(ii) In a case involving collateral pledged or otherwise provided by the defendant, the amount the victim has recovered at the time of sentencing from disposition of the collateral, or if the collateral has not been disposed of by that time, the fair market value of the collateral at the time of sentencing.

(iii) Notwithstanding clause (ii), in the case of a fraud involving a mortgage loan, if the collateral has not been disposed of by the time of sentencing, use the fair market value of the collateral as of the date on which the guilt of the defendant has been established, whether by guilty plea, trial, or plea of nolo contendere.

In such a case, there shall be a rebuttable presumption that the most recent tax assessment value of the collateral is a reasonable estimate of the fair market value. In determining whether the most recent tax assessment value is a reasonable estimate of the fair market value, the court may consider, among other factors, the recency of the tax assessment and the extent to which the jurisdiction's tax assessment practices reflect factors not relevant to fair market value.

**C. SUGGESTED GUIDELINES RANGE CALCULATION**

We respectfully ask the Court to calculate the offense level as follows:

<b>Base Offense Level-</b> Pursuant to U.S.S.G. § 2B1.1(a)(1) :	<b>7</b>
<b>Specific Offense Characteristics:</b> The instant offense involved loss of \$184,720.72 resulting from a foreclosure sale.	<b>10</b>
<b>Adjusted Offense Level (Subtotal):</b>	<b>17</b>
<b>Acceptance of Responsibility:</b>	<b>-2</b>
<b>Acceptance of Responsibility:</b>	<b>-1</b>

**Total Offense Level:**

**15**

**D. DEFENSE'S DISPUTE OF PROBATION'S "SPECIFIC OFFENSE CHARACTERISTIC" CALCULATION.**

The defense vehemently opposes the "Specific Offense Characteristic" calculation set forth in the Presentence Report. It is important to note that the so-called losses depicted in bolded font in the chart on Pages Six-Seven of the Report is unreliable, grounded in pure speculation and conjecture and is seemly presented to Your Honor in bad faith. One clear example that the chart is patently wrong can be seen with respect to the last property listed on the chart on the bottom of Page 7. That property, located at 120-46 131<sup>st</sup> Street, reflects a loan amount of \$73,926 but an "actual loss" amount of \$379,620. This is clearly incorrect as interest is excluded when calculating the loss amount.

Another glaring example that the chart is per se invalid and unreliable is the missing variable with respect to every property used to calculate the loss amount figure. Probation provided the Court with the loan amount, conceded that the balance due on the loan is "unknown" yet was able to indicate an actual loss. If the balance due on the mortgage loan is "unknown," there is no conceivable way Probation can determine the actual loss.

Moreover, Probation concluded that the loss amount is \$1,587,310 without indicating in their chart whether any of the bolded properties used to reach the loss amount have been disposed of. Without knowing whether each property has been disposed of, the Court cannot properly provide credit against the so-called losses nor use the alternative in determining loss, the fair market value, as delineated in §2B1.1 of the Sentencing Guidelines.



Specifically, the following properties used to calculate the loss amount is disproven by official records filed with the County Clerk's Office showing that, with the exception of one property, the mortgages were fully satisfied and paid in full as indicated below:

117-19 164 <sup>th</sup> Street	Satisfaction of mortgage paid in full See <b>Exhibit A</b>
115-03 168 <sup>th</sup> Street	<b>Sold via Referee Sale for \$185,000.</b> See <b>Exhibit B</b>
107 Patchen Avenue	Satisfaction of mortgage paid in full See <b>Exhibit C</b>
130-09 120 <sup>th</sup> Street	Satisfaction of mortgage paid in excess of mortgage- See <b>Exhibit D</b>
133-33 127 <sup>th</sup> Street	Satisfaction of mortgage paid in full See <b>Exhibit E</b>
101-16 114 <sup>th</sup> Street	Satisfaction of mortgage paid in full See <b>Exhibit F</b>
120-46 131 <sup>st</sup> Street	Satisfaction of mortgage paid in full See <b>Exhibit G</b>

**E. DEFENSE'S DISPUTE OF PROBATION'S FINDING THAT MR. BADOOLAH WAS THE ORGANIZER OR LEADER AND THE SCHEME INVOLVED SOPHISTICATED MEANS.**

The only person charged in the Indictment is Mr. Badoolah. Upon information and belief, other than the defendant, Carl Bennett is the only person known to the defense who was arrested and prosecuted for crime(s) related to the instant offense. Probation's summary statement that this conspiracy involved five or more participant is baseless and void of any substantive proof in support of same. Nothing presented to the Court or the defense supports the conclusion that Mr. Badoolah was the organizer and or ring leader of this conspiracy. Accordingly, a four-level adjustment is unwarranted.

The Probation Department further asserted that the conspiracy involved sophisticated means because Mr. Badoolah created corporate entities for the sole

purpose of buying and selling real properties. This form of purchasing real estate is far from sophisticated, legal, is done every day across the country and is even encouraged by real estate attorneys to limit any potential liability. As such, the two-level increase for sophisticated means is likewise unwarranted. Notably, the Gov't did not include these factors in the plea agreement.

#### **F. INTERNATIONAL TRIPS AND FRAUDULENT IDENTIFICATIONS.**

The trips highlighted to this Court are perfectly legal and were made for business and/or familial purposes. Nothing about these trips should impact Mr. Badoolah's sentence.

Mr. Badoolah vehemently denies any association with any fraudulent documents produced by the Department of State. Furthermore, he legally sought a name change at the Queens County Civil Court on October 3, 2012, prior to his arrest, which the Court granted on January 9, 2013. *See Exhibit H.* Based on the foregoing neither of these allegations should be considered by the Court to enhance Mr. Badoolah's sentence.

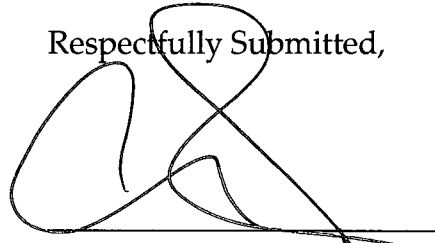
#### **G. CONCLUSION**

Mr. Badoolah lived an exemplary life for over thirty (30) years and then deviated from this path in a misguided effort to secure a better life for his family. His role in this conspiracy was miniscule compared to the more culpable conduct of others, but Mr. Badoolah has accepted full responsibility for his role in the offense.

As mentioned in the opening paragraph, Mr. Badoolah has been subjected to home confinement for approximately 43 months. There is no dispute that he has already been punished to some extent by his pretrial home detention. United States v. Miller, 991 F.2d 552, 554 (9<sup>th</sup> Cir. 1993). I implore Your Honor to consider the relatively minor

loss, strong work ethic, Mr. Badoolah's extensive home confinement, his medical issues, and his eight dependents, and ask Your Honor to impose a sentence of time served.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'CR', written over a horizontal line.

Camille O. Russell, Esq.  
Russell Law Group, PLLC  
Attorneys for Mr. Imran Badoolah  
400 Post Avenue, Suite 401  
Westbury, New York, 11590  
(516) 876-9300  
Atty#: 4148151



# EXHIBIT A



# EXHIBIT B

CaseGen: 147354

## REFeree's DEED

This Deed, made this August 19, 2010 between BIBI SANASIE by Leslie S. Nizin Esq., Referee, with an address of 125-10 Queens Blvd, Suite 6, Kew Gardens, NY 11415-1519, being the party of the first part and **Three Kings of Queens LLC, 1501 Broadway, Ste 1313, New York, NY 10036** being the party of the second part, *INC 595 SOUTH FEDERAL HIGHWAY STE 600 BOCA RATON FL 33432*

WITNESSETH, that the party of the first part was appointed REFEREE in an action entitled HSBC MORTGAGE CORPORATION (USA) vs. BIBI SANASIE, et al. to foreclose a mortgage(s) recorded in the Queens County Clerk's Office at Certificate/Docket Number 2009000000817 filed under Index Number 7132/09. Said mortgage was duly assigned by assignment dated the 19th day of March, 2009, and recorded on the 6th day of April, 2009, in the Office of the City Register of the City of New York at Instrument No. 2009000099375;

In pursuance of a JUDGMENT OF FORECLOSURE in said action, executed by the SUPREME COURT and duly entered on the 17th day of September, 2009, and in consideration of the sum of **ONE HUNDRED EIGHTY FIVE THOUSAND Dollars (\$185,000.00)**, being the highest sum bid at sale, the party of the first part does hereby grant and convey unto the party of the second part, its successors and assigns, the premises described in "Schedule A" attached hereto,

To have and to hold the premises so conveyed unto the party of the second part, its successors and assigns forever.

The premises are not subject to a credit line mortgage.

In witness whereof, the party of the first part has set her hand the day and year first above written.

For tax assessor/indexing use:

Section, Block and Lot number, or Block and Lot number: Block 12343, Lot 201

Property address: 115-03 168TH STREET, QUEENS, NY 11434

Tax mailing address: 1501 Broadway, Ste 1313, New York, NY 10036

*Leslie S. Nizin Esq.*  
Leslie S. Nizin Esq., as Referee

STATE OF NEW YORK )  
COUNTY OF QUEENS ) SS.  
CITY OF )

On this August 19, 2010, before me, the undersigned, personally appeared Leslie S. Nizin Esq., personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Doretta R. Scarola*  
DORETTA R. SCAROLA  
Notary Public, State of New York  
No. 01SC4704956  
Qualified in Nassau County  
Commission Expires November 30, 2013  
Notary Public

**SEAL**

After recording, return this deed to: **Three Kings of Queens LLC, 1501 Broadway, Ste 1313, New York, NY 10036**

# EXHIBIT C



Loan #: 706549



## STANDARD FORM OF SATISFACTION OF MORTGAGE

**KNOW ALL MEN BY THESE PRESENTS, THAT:**

CASTLE PEAK 2012-1 LOAN TRUST MORTGAGE BACKED NOTES, SERIES 2012-1, BY U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE BY: SELENE FINANCE LP, ITS ATTORNEY IN FACT, A DELAWARE LIMITED PARTNERSHIP, whose address is SELENE FINANCE LP, 9990 RICHMOND AVE, STE 400 S, HOUSTON, TEXAS 77042 does hereby certify that the following mortgage is satisfied and does hereby consent that the same be discharged of record. Mortgage dated the 8/15/2007 by BIBI S. ALI, A SINGLE WOMAN to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AS NOMINEE FOR LEHMAN BROTHERS BANK, FSB, ITS SUCCESSORS AND ASSIGNS in the principal sum of \$736,250.00 and recorded on 5/8/2008, in Mortgage record as Document No. 2008000187838 in the office of the clerk of the County of KINGS in the State of New York, described as follows: Block 1638, Lot 1

Property Address: 107 PATCHEN AVE, BROOKLYN, NY 11221

Assignment from Mortgage Electronic Registration Systems, Inc. as nominee for Lehman Brothers Bank, FSB to Aurora Loan Services, LLC recorded 9/30/2008 as CRFN 2008000387714; Assignment from Aurora Loan Services, LLC to CPCA Trust I recorded 10/19/2012 as CRFN 2012000414253; Assignment from CPCA Trust I to Castle Peak 2012-1 Loan Trust recorded 10/19/2012 as CRFN 2012000414254; Assignment from Castle Peak 2012-1 Loan Trust to Castle Peak 2012-1 Loan Trust Mortgage Backed Notes, Series 2012-1 BY: U.S. Bank, National Association, as Indenture Trustee to be recorded concurrently herewith.

DATED: 25<sup>th</sup> day of October, 2013.

CASTLE PEAK 2012-1 LOAN TRUST MORTGAGE BACKED NOTES, SERIES 2012-1, BY U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE BY: SELENE FINANCE LP, ITS ATTORNEY IN FACT, A DELAWARE LIMITED PARTNERSHIP

BY

Name: Donna Brammer

Title: Vice President


Power of Attorney recorded 1/22/2013 as Inst. 2013000028023

THIS INSTRUMENT WAS PREPARED BY AND AFTER RECORDING RETURN TO:  
Charles A. Brown & Associates, P.L.L.C., 2316 Southmore, Pasadena, TX 77502

STATE OF TEXAS

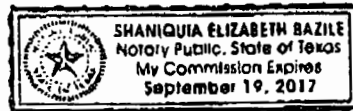
COUNTY OF HARRIS

On 10-25 day of 2013, before me, the undersigned, personally appeared Donna Brammer, the Vice President of SELENE FINANCE LP, A DELAWARE LIMITED PARTNERSHIP, ATTORNEY IN FACT FOR CASTLE PEAK 2012-1 LOAN TRUST MORTGAGE BACKED NOTES, SERIES 2012-1, BY U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is(are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), that by his/her their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument, and that such individual made such appearance before the undersigned in the City of HOUSTON, COUNTY OF HARRIS, STATE OF TEXAS.

  
NOTARY PUBLIC, STATE OF TEXAS

Shaniquia Elizabeth Bazile  
NOTARY'S PRINTED NAME  
MY COMMISSION EXPIRES: September 19, 2017


For Notary Seal:



SEAL

Mortgage dated 8/15/2007 in the amount of \$736,250.00

# EXHIBIT D

FOR CITY USE ONLY				<b>REAL PROPERTY TRANSFER REPORT</b> STATE OF NEW YORK STATE BOARD OF REAL PROPERTY SERVICES <b>RP - 5217NYC</b>											
<b>C1. County Code</b> _____ <b>C2. Date Deed Recorded</b> _____ Month Day Year															
<b>C3. Book OR C5. CRFN</b> _____ <b>C4. Page</b> _____															
<b>PROPERTY INFORMATION</b>															
<b>1. Property Location</b> <u>130-09</u> <u>120TH STREET</u> <u>QUEENS</u> <u>11420</u> <small>STREET NUMBER STREET NAME BOROUGH ZIP CODE</small>															
<b>2. Buyer Name</b> <u>PENNYMAC CORP.</u> <small>LAST NAME / COMPANY FIRST NAME</small>															
<b>3. Tax Billing Address</b> <u>Indicate where future Tax Bills are to be sent</u> <u>If other than buyer address (at bottom of form)</u> <u>LAST NAME / COMPANY</u> <u>FIRST NAME</u> <small>STREET NUMBER AND STREET NAME CITY OR TOWN STATE ZIP CODE</small>															
<b>4. Indicate the number of Assessment Roll parcels transferred on the deed</b> <u>1</u> <b># of Parcels</b> OR <input type="checkbox"/> <b>Part of a Parcel</b>		<b>4A. Planning Board Approval - N/A for NYC</b> <b>4B. Agricultural District Notice - N/A for NYC</b> <b>Check the boxes below as they apply:</b> <b>6. Ownership Type is Condominium</b> <input type="checkbox"/> <b>7. New Construction on Vacant Land</b> <input type="checkbox"/>													
<b>5. Deed Property Size</b> <u>FRONT FEET</u> <u>X</u> <u>DEPTH</u> OR <u>ACRES</u>															
<b>8. Seller Name</b> <u>STEINBERG, ESQ., AS REFEREE</u> <u>JASON B</u> <small>LAST NAME / COMPANY FIRST NAME</small>															
<b>9. Check the box below which most accurately describes the use of the property at the time of sale:</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 25%;"><b>A</b> <input checked="" type="checkbox"/> <b>One Family Residential</b></td> <td style="width: 25%;"><b>C</b> <input type="checkbox"/> <b>Residential Vacant Land</b></td> <td style="width: 25%;"><b>E</b> <input type="checkbox"/> <b>Commercial</b></td> <td style="width: 25%;"><b>G</b> <input type="checkbox"/> <b>Entertainment / Amusement</b></td> <td style="width: 25%;"><b>I</b> <input type="checkbox"/> <b>Industrial</b></td> </tr> <tr> <td><b>B</b> <input type="checkbox"/> <b>2 or 3 Family Residential</b></td> <td><b>D</b> <input type="checkbox"/> <b>Non-Residential Vacant Land</b></td> <td><b>F</b> <input type="checkbox"/> <b>Apartment</b></td> <td><b>H</b> <input type="checkbox"/> <b>Community Service</b></td> <td><b>J</b> <input type="checkbox"/> <b>Public Service</b></td> </tr> </table>						<b>A</b> <input checked="" type="checkbox"/> <b>One Family Residential</b>	<b>C</b> <input type="checkbox"/> <b>Residential Vacant Land</b>	<b>E</b> <input type="checkbox"/> <b>Commercial</b>	<b>G</b> <input type="checkbox"/> <b>Entertainment / Amusement</b>	<b>I</b> <input type="checkbox"/> <b>Industrial</b>	<b>B</b> <input type="checkbox"/> <b>2 or 3 Family Residential</b>	<b>D</b> <input type="checkbox"/> <b>Non-Residential Vacant Land</b>	<b>F</b> <input type="checkbox"/> <b>Apartment</b>	<b>H</b> <input type="checkbox"/> <b>Community Service</b>	<b>J</b> <input type="checkbox"/> <b>Public Service</b>
<b>A</b> <input checked="" type="checkbox"/> <b>One Family Residential</b>	<b>C</b> <input type="checkbox"/> <b>Residential Vacant Land</b>	<b>E</b> <input type="checkbox"/> <b>Commercial</b>	<b>G</b> <input type="checkbox"/> <b>Entertainment / Amusement</b>	<b>I</b> <input type="checkbox"/> <b>Industrial</b>											
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<b>SALE INFORMATION</b>															
<b>10. Sale Contract Date</b> <u>12 / 2 / 2011</u> <small>Month Day Year</small>		<b>14. Check one or more of these conditions as applicable to transfer:</b> <table style="width: 100%; border: none;"> <tr><td><b>A</b> <input type="checkbox"/> Sale Between Relatives or Former Relatives</td></tr> <tr><td><b>B</b> <input type="checkbox"/> Sale Between Related Companies or Partners in Business</td></tr> <tr><td><b>C</b> <input type="checkbox"/> One of the Buyers is also a Seller</td></tr> <tr><td><b>D</b> <input type="checkbox"/> Buyer or Seller is Government Agency or Lending Institution</td></tr> <tr><td><b>E</b> <input type="checkbox"/> Deed Type not Warranty or Bargain and Sale (Specify Below)</td></tr> <tr><td><b>F</b> <input type="checkbox"/> Sale of Fractional or Less than Fee Interest (Specify Below)</td></tr> <tr><td><b>G</b> <input type="checkbox"/> Significant Change in Property Between Taxable Status and Sale Dates</td></tr> <tr><td><b>H</b> <input type="checkbox"/> Sale of Business is Included in Sale Price</td></tr> <tr><td><b>I</b> <input type="checkbox"/> Other Unusual Factors Affecting Sale Price (Specify Below)</td></tr> <tr><td><b>J</b> <input checked="" type="checkbox"/> None</td></tr> </table>				<b>A</b> <input type="checkbox"/> Sale Between Relatives or Former Relatives	<b>B</b> <input type="checkbox"/> Sale Between Related Companies or Partners in Business	<b>C</b> <input type="checkbox"/> One of the Buyers is also a Seller	<b>D</b> <input type="checkbox"/> Buyer or Seller is Government Agency or Lending Institution	<b>E</b> <input type="checkbox"/> Deed Type not Warranty or Bargain and Sale (Specify Below)	<b>F</b> <input type="checkbox"/> Sale of Fractional or Less than Fee Interest (Specify Below)	<b>G</b> <input type="checkbox"/> Significant Change in Property Between Taxable Status and Sale Dates	<b>H</b> <input type="checkbox"/> Sale of Business is Included in Sale Price	<b>I</b> <input type="checkbox"/> Other Unusual Factors Affecting Sale Price (Specify Below)	<b>J</b> <input checked="" type="checkbox"/> None
<b>A</b> <input type="checkbox"/> Sale Between Relatives or Former Relatives															
<b>B</b> <input type="checkbox"/> Sale Between Related Companies or Partners in Business															
<b>C</b> <input type="checkbox"/> One of the Buyers is also a Seller															
<b>D</b> <input type="checkbox"/> Buyer or Seller is Government Agency or Lending Institution															
<b>E</b> <input type="checkbox"/> Deed Type not Warranty or Bargain and Sale (Specify Below)															
<b>F</b> <input type="checkbox"/> Sale of Fractional or Less than Fee Interest (Specify Below)															
<b>G</b> <input type="checkbox"/> Significant Change in Property Between Taxable Status and Sale Dates															
<b>H</b> <input type="checkbox"/> Sale of Business is Included in Sale Price															
<b>I</b> <input type="checkbox"/> Other Unusual Factors Affecting Sale Price (Specify Below)															
<b>J</b> <input checked="" type="checkbox"/> None															
<b>11. Date of Sale / Transfer</b> <u>12 / 14 / 2011</u> <small>Month Day Year</small>															
<b>12. Full Sale Price \$</b> <u>6 7 1 7 8 6</u> <small>(Full Sale Price is the total amount paid for the property including personal property. This payment may be in the form of cash, other property or goods, or the assumption of mortgages or other obligations.) Please round to the nearest whole dollar amount.</small>															
<b>13. Indicate the value of personal property included in the sale</b> _____															
<b>ASSESSMENT INFORMATION - Data should reflect the latest Final Assessment Roll and Tax Bill</b>															
<b>15. Building Class</b> <u>A, 1</u>		<b>16. Total Assessed Value (of all parcels in transfer)</b> <u>1 7 0 1 7</u>													
<b>17. Borough, Block and Lot / Roll Identifier(s) (If more than three, attach sheet with additional identifier(s))</b> <u>QUEENS 11727 35</u>															

**CERTIFICATION**

I certify that all of the items of information entered on this form are true and correct (to the best of my knowledge and belief) and understand that the making of any willful false statement of material fact herein will subject me to the provisions of the penal law relative to the making and filing of false instruments.

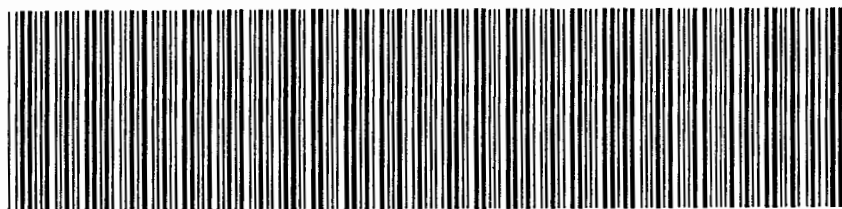
BUYER			BUYER'S ATTORNEY	
BUYER SIGNATURE		DATE	DEROSE & SURICO	
27001 AGOURA ROAD			LAST NAME	FIRST NAME
			718	279-2000
STREET NUMBER	STREET NAME (AFTER SALE)		AREA CODE	TELEPHONE NUMBER
CALABASAS				SELLER
	CA	91301		
CITY OR TOWN	STATE	ZIP CODE	SELLER SIGNATURE	
			DATE	

2011120700369201



**NYC DEPARTMENT OF FINANCE  
OFFICE OF THE CITY REGISTER**

This page is part of the instrument. The City Register will rely on the information provided by you on this page for purposes of indexing this instrument. The information on this page will control for indexing purposes in the event of any conflict with the rest of the document.


**2012022700587001003E6D0B**
**RECORDING AND ENDORSEMENT COVER PAGE**
**PAGE 1 OF 4**
**Document ID: 2012022700587001**
**Document Date: 12-14-2011**
**Preparation Date: 03-29-2012**
**Document Type: DEED**
**Document Page Count: 3**
**PRESENTER:**

INTRACOASTAL ABSTRACT CO., INC.  
31 STEWART STREET  
FP~PICK UP KAREN LEVINE  
FLORAL PARK, NY 11001  
516-358-0505  
M-24813Q

**RETURN TO:**

DEROSE & SURICO  
213-44 38TH AVENUE  
BAYSIDE, NY 11361  
718-279-2000

**PROPERTY DATA**

Borough	Block	Lot	Unit	Address
QUEENS	11727	35	Entire Lot	130-09 120TH STREET
<b>Property Type: DWELLING ONLY - 1 FAMILY</b>				

**CROSS REFERENCE DATA**

CRFN \_\_\_\_\_ or Document ID \_\_\_\_\_ or \_\_\_\_\_ Year \_\_\_\_\_ Reel \_\_\_\_\_ Page \_\_\_\_\_ or File Number \_\_\_\_\_

**PARTIES**
**GRANTOR/SELLER:**

JASON B. STEINBERG, ESQ., AS REFEREE  
67-30 DARTMOUTH STREET, #7L  
FOREST HILLS, NY 11375

**GRANTEE/BUYER:**

PENNYMAC CORP.  
27001 AGOURA ROAD  
CALABASAS, CA 91301

**FEES AND TAXES**

<b>Mortgage</b>		<b>Filing Fee:</b>	
Mortgage Amount:	\$	0.00	\$ 125.00
Taxable Mortgage Amount:	\$	0.00	NYC Real Property Transfer Tax:
Exemption:			\$ 9,572.95
TAXES: County (Basic):	\$	0.00	NYS Real Estate Transfer Tax:
City (Additional):	\$	0.00	\$ 2,688.00
Spec (Additional):	\$	0.00	
TASF:	\$	0.00	
MTA:	\$	0.00	
NYCTA:	\$	0.00	
Additional MRT:	\$	0.00	
<b>TOTAL:</b>	<b>\$</b>	<b>0.00</b>	
Recording Fee:	\$	52.00	
Affidavit Fee:	\$	0.00	

**RECORDED OR FILED IN THE OFFICE  
OF THE CITY REGISTER OF THE  
CITY OF NEW YORK**

Recorded/Filed 04-09-2012 10:23

City Register File No.(CRFN):

**2012000136563**

**City Register Official Signature**

# EXHIBIT E

Recording Requested By:  
VERDUGO TRUSTEE SERVICE CORPORATION

When Recorded Return To:

SHAKIR KARMOEDDIEN  
13333 127TH STREET  
JAMAICA, NY 11420

**SATISFACTION OF MORTGAGE**

CITIMORTGAGE, INC. #:2004809197 "KARMOEDDIEN" Queens, New York  
KNOW ALL MEN BY THESE PRESENTS that CITIMORTGAGE, INC., whose address is 14700 CITICORP DRIVE, MC 1020, HAGERSTOWN, MD 21742, holder of a certain mortgage evidencing an indebtedness in the amount of \$70,000.00 plus interest, whose parties, dates and recording information are below, does hereby acknowledge that it has received full payment and satisfaction of the same, and in consideration thereof, does hereby satisfy and discharge said mortgage.

Mortgagor: SHAKIR KARMOEDDIEN  
Mortgagee: HORIZON BANKS N.A., NATIONAL MORTGAGE DIVISION  
Dated: 11/08/2007 Recorded: 03/24/2008 in Book/Reel/Liber: N/A Page/Folio: N/A as Instrument No.: 2008000117262  
This mortgage has not been assigned unless stated below.

-Assigned Wholly by MILE HIGH BANKS N.A., NATIONAL MORTGAGE DIVISION F/K/A HORIZON BANKS, N.A., NATIONAL MORTGAGE DIVISION TO CITIMORTGAGE, INC. Dated: 10/13/2011 Document to be recorded concurrently herewith

Section/Block/Lot -11786-20


Property Address: 13333 127TH STREET, JAMAICA, NY 11420

County: Queens

State of New York

IN WITNESS WHEREOF, CITIMORTGAGE, INC., by the officer duly authorized, has duly executed the foregoing instrument.

CITIMORTGAGE, INC.  
On November 23rd, 2011

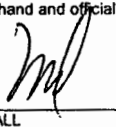
By:   
SHAWN LYERLY, Vice-President



STATE OF Maryland  
COUNTY OF Washington

On the 23rd day of November in the year 2011 before me, the undersigned, personally appeared SHAWN LYERLY, Vice-President, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is(are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument, and that such individual(s) made such appearance before the undersigned in the County of Washington, State of Maryland.

WITNESS my hand and official seal,

  
MARY K. DUVALL  
Notary Expires: 10/07/2014  
Washington, Maryland

Mary K. Duvall  
Notary Public  
Frederick Co., MD

**SEAL**

# EXHIBIT F

Return By Mail To:  
Ditech Financial LLC  
C/O Nationwide Title Clearing,  
Inc. 2100 Alt. 19 North  
Palm Harbor, FL 34683

Loan #: 89169864

**SATISFACTION OF MORTGAGE**

**KNOW ALL MEN BY THESE PRESENTS**, that **PINTA, LLC SUCCESSOR IN INTEREST TO ASSETS OF UM CAPITAL, LLC** having its principal place of business at:  
7360 SOUTH KYRENE RD., T324  
~~TEMPE, AZ 85283~~

Does hereby proclaim that the following Mortgage(s) is(are) paid, and does hereby consent that the same be discharged of record.


Mortgage dated 08/02/2005, made by **INDRAVADAN PATEL** (Borrower/s) to **MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AS NOMINEE FOR FIRST NATIONAL BANK OF ARIZONA, ITS SUCCESSORS AND ASSIGNS** (Lender) in the principal sum of \$130,000.00 and recorded on 10/24/2005 as **CRFN # 2005000593112**, in the Office of the Clerk of **QUEENS** County, **NY**.

See Exhibit attached for Assignments, Modifications etc.

Property Address: 101-16 114TH STREET  
RICHMOND HILLS, NY 11419


**Dated this 12th day of January in the year 2016**

**PINTA, LLC SUCCESSOR IN INTEREST TO ASSETS OF UM CAPITAL, LLC**, by **DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC**, its Attorney-in-Fact (POA RECORDED: 09/11/2015 INSTR#: 2015000318968)

  
SHANNON MCKINNEY

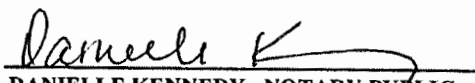
VICE PRESIDENT

All persons whose signatures appear above have qualified authority to sign and have reviewed this document and supporting documentation prior to signing.

  
TIFFANY FLOYD  
WITNESS

STATE OF FLORIDA  
COUNTY OF PINELLAS

Before me, **this 12th day of January in the year 2016**, the undersigned, personally appeared **Shannon McKinney** as VICE PRESIDENT for **DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC** as Attorney-in-Fact for **PINTA, LLC SUCCESSOR IN INTEREST TO ASSETS OF UM CAPITAL, LLC**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that they executed the same in their capacity(ies), and that by their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

  
DANIELLE KENNEDY - NOTARY PUBLIC  
COMM: EXPIRES 06/26/2017

 DANIELLE KENNEDY  
NOTARY PUBLIC  
STATE OF FLORIDA  
Comm# FF031287  
Expires 6/26/2017

Document Prepared By: E.Lance/NTC, 2100 Alt. 19 North, Palm Harbor, FL 34683 (800)346-9152

Property ID(S/B/L) Block: 9431 Lot: 14

GTSRC 393784933 6@ \$47.00 DOCR T0816014717 [C-2] ERCNNY1



\*D0014530923\*



# EXHIBIT G

**When Recorded Return To:**

LIEN RELEASE DEPT  
WELLS FARGO BANK, N.A.  
MAC X9901-L1R  
P.O. BOX 1629  
MINNEAPOLIS, MN 55440

### SATISFACTION OF MORTGAGE

WF HOME EQUITY #:83785079025210001 "MCFARLANE" Lender ID:0 Queens, New York

KNOW ALL MEN BY THESE PRESENTS that WELLS FARGO BANK, N.A., whose address is 2701 WELLS FARGO WAY, MAJ# X9901-L1R, MINNEAPOLIS, MN 55467, holder of a certain mortgage evidencing an indebtedness in the amount of \$73,926.00 plus interest, whose parties, dates and recording information are below, does hereby acknowledge full payment and satisfaction of the same, and in consideration thereof, does hereby satisfy and discharge said mortgage.

**Mortgagor: SPENCER MCFARLANE**

Mortgagee: WELLS FARGO BANK, N.A.

Dated: 01/10/2008 Recorded: 04/16/2008 in Book/Reel/Liber: N/A Page/Folio: N/A as Instrument No.: 2008000151141

**This mortgage has not been assigned unless stated below.**

Section/Block/Lot N/A-11754-80

Property Address: 12046 131ST STREET, SOUTH OZONE PARK, NY 11420

County: Queens

State of New York

IN WITNESS WHEREOF, WELLS FARGO BANK, N.A., by the officer duly authorized, has duly executed the foregoing instrument.

WELLS FARGO BANK, N.A.

On March 20th, 2015

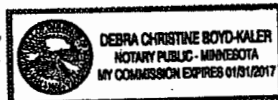
By: Mary Anne Bock  
MARY ANNE BOCK, Vice President Loan  
Documentation

STATE OF Minnesota  
COUNTY OF Hennepin

On the 20th day of March in the year 2015 before me, the undersigned, personally appeared MARY ANNE BOCK, Vice President Loan Documentation, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument, and that such individual(s) made such appearance before the undersigned in the County of Hennepin, State of Minnesota.

**WITNESS my hand and official seal.**

DEBRA CHRISTINE BOYD-KALER  
Notary Expires: 01/31/2017  
Hennepin, Minnesota



# SEAL

(This area for notarial seal)

# EXHIBIT H

Civil Court of the City of New York  
County of Queens  
89-17 Sutphin Boulevard, Jamaica, NY 11435

Index Number: NC-000961-12/QU

In the Matter of the Application of  
**IMRAN ISHMI BADOOLAH AKA IMRAN I  
BADOOLAH**  
For Leave to Change His/Her Name To  
**SULTAN IMRAN ISMAAIL ABDULLAH BAADOOLAH**

**ORDER  
GRANTING LEAVE  
TO CHANGE NAME**

Upon the annexed Petition(s) of IMRAN ISHMI BADOOLAH AKA IMRAN I BADOOLAH verified on October 03, 2012, requesting that IMRAN ISHMI BADOOLAH be permitted to assume the name(s) of (First) SULTAN (Middle) IMRAN ISMAAIL (Last) ABDULLAH BAADOOLAH, and the Court being satisfied that the Petition is true, and it appearing from the Petition and the Court being satisfied that there is no reasonable objection to the change of name(s) proposed, it is hereby **ORDERED** that,

1) The individual currently known as (First) IMRAN (Middle) ISHMI (Last) BADOOLAH AKA IMRAN I BADOOLAH who was born on September 16, 1979, at GUYANA, with COPY OF USA PASSPORT NO. 113188352 as proof of birth, since no birth certificate is available, is hereby authorized to assume the name of (First) SULTAN (Middle) IMRAN ISMAAIL (Last) ABDULLAH BAADOOLAH in place and stead of his/her present name upon complying with the provisions of Article 6 of the Civil Rights Law and of this Order.

2) This Order, consisting of a total of 2 page(s), shall be entered, and the Petition upon which it was granted shall be filed, prior to the publication hereinafter directed, in the office of the Clerk of the Civil Court of the City of New York, County of Queens.

3) Within sixty days of the making of this Order, a copy of this Order and supporting papers shall be served upon the following:

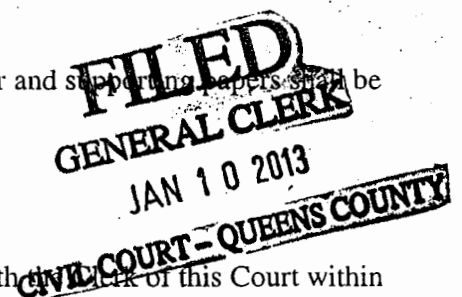
not applicable

4) Proof of service on the above indicated party(ies) shall be filed with the Clerk of this Court within ninety days of the making of this Order.

5) At least once within sixty days of the making of this Order, a notice shall be published in

*Western Queens Gazette* newspaper(s) in substantially the following form:

Notice is hereby given that an Order entered by the Civil Court, Queens County on 1/9/13, bearing Index Number NC-000961-12/QU, a copy of which may be examined at the Office of the Clerk, located at 89-17 Sutphin Boulevard, Jamaica, NY 11435, grants me (us) the right to:



Civil Court of the City of New York

County of Queens

IMRAN ISHMILE BADOOLAH TO SULTAN IMRAN

ISMAAIL ABDULLAH BAADOOLAH

Page 2 of 2

Index Number: NC-000961-12/QU

**ORDER GRANTING LEAVE TO CHANGE NAME**

Assume the name of (First) SULTAN (Middle) IMRAN ISMAAIL (Last) ABDULLAH BAADOOLAH

My present name is (First) IMRAN (Middle) ISHMILE (Last) BADOOLAH AKA IMRAN I BADOOLAH

My present address is 133-33 127 ST., South Ozone Park, NY 11420-

My place of birth is GUYANA

My date of birth is September 16, 1979

6) Within ninety days of the making of this Order, proof of such publication, by Affidavit, shall be filed with the Clerk of the Civil Court in the County of Queens.

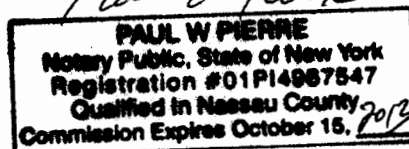
7) Following the filing of the Petition and the entry of this Order as directed in Paragraph 2 above; the service of such Order and such papers as directed in paragraph 3 above; the filing of proof of such service as directed in Paragraph 4 above; the publication of such notice as directed in Paragraph 5 above; and the filing of proof of such publication as directed in Paragraph 6 above, it is further **ORDERED** that (First) IMRAN (Middle) ISHMILE (Last) BADOOLAH AKA IMRAN I BADOOLAH shall be known by the name (First) SULTAN (Middle) IMRAN ISMAAIL (Last) ABDULLAH BAADOOLAH, which s/he is hereby authorized to assume.

1/9/13

Date

Judge, Civil Court

Honorable Charles S. Lopresto



5-13-2013

COPY OF ORIGINAL